

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

FILING OF OWEN ELECTRIC COOPERATIVE, INC.)	Case No.
TO IMPLEMENT A TIME OF DAY TARIFF FOR ITS)	2012-00154
SMART HOME PILOT PROGRAM)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO OWEN ELECTRIC COOPERATIVE, INC.

Owen Electric Cooperative, Inc. ("Owen"), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the issuance of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Owen shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Owen fails or refuses to furnish all or part of the requested information, it shall provide a

written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request.

1. Owen's rates resulting from Case No. 2011-00037¹ were effective for service rendered on March 1, 2012. Has Owen determined the subsequent effect upon its revenue of the new rates for March or April 2012 for its residential and small commercial customers? Explain. Include all calculations and workpapers necessary to support your explanation.

2. Owen proposes its new Smart Home Time of Day ("Smart Home TOD") program as a pilot. Explain whether the pilot is either limited to a certain number of customers, or if it is to be limited to a set length of time.

3. Explain whether Owen has estimated the number of participants in the Smart Home TOD program, either initially or over time.

4. Explain whether Owen is confident that any erosion of revenue that could occur as a result of its Smart Home TOD program will be adequately tempered by Owen's rate design changes authorized in Case No. 2011-00037, or if decreased revenue could eventually cause rates to increase for all residential and small commercial customers.

¹ Case No. 2011-00037, Application of Owen Electric Cooperative Corporation for an Order Authorizing a Change in Rate Design for Its Residential and Small Commercial Rate Classes, and the Proffering of Several Optional Rate Designs for the Residential Rate Classes (Ky. PSC Feb. 29, 2012).

5. Is Owen's proposed Smart Home TOD rate designed to be bill-neutral if a customer takes no action in changing their energy consumption pattern? Explain.

6. a. Would Owen object to a reporting requirement on the results of its Smart Home TOD program if the program is approved?

b. If reporting is required, what frequency, format, and type of data would Owen recommend including in a report?

7. Explain why Owen proposes a two-year commitment for participation in the Smart Home TOD program.

8. Explain the development of the energy charge component of the Smart Home TOD rate. Include all calculations and workpapers necessary to support your response.

9. Owen's On-peak, Off-peak, and Shoulder hours differ from the On-peak and Off-peak hours of East Kentucky Power Cooperative, Inc. ("East Kentucky"), Owen's energy supplier. For example, Owen has a separate rate for Shoulder hours that East Kentucky does not have. Explain why the On-peak and Off-peak demand periods for a program designed to shift usage to periods of lower demand should not match the On-peak and Off-peak demand periods of its supplier.

10. In Case No. 2011-00037, the key components identified for the Smart Home TOD program were: 1) Smart thermostat; 2) Water heater control; 3) Smart appliances; 4) Smart switch; 5) Home management system consisting of display, communication system, meter and home software; 6) Host software; and 7) Third party interface. Provide a brief explanation of each component, including whether each component is still part of Owen's current proposal. If any component has been eliminated, or changed, explain why.

11. Explain whether vendors other than Tendril have been chosen for the hardware and software requirements for the Smart Home TOD program. Include in the explanation how the vendors were chosen, whether through an RFP or otherwise; and how the comparative costs were evaluated. Include all calculations and workpapers necessary to support your explanation.

12. Provide the cost to equip an individual home with the necessary software and hardware to participate in the Smart Home TOD program. When possible, list each item separately, including the cost of the item and estimated labor to install the item.

13. Confirm that the Smart Home TOD program is entirely voluntary and whether there is an initial cost for joining the program, or if a participant is responsible for separately covering any of the costs incurred for installation of the necessary hardware or software.

14. Explain whether there are any terms or conditions for participation in the Smart Home TOD program other than those set forth in Owen's Schedule 1-B4 Smart Home Pilot – Time of Day tariff.

15. Refer to Item 3 in the Response to the Attorney General's Supplemental Data Request in Case No. 2011-00037² and Item 1 of Owen's Response to Information Request at Hearing filed with the Commission on May 3, 2012.

a. Identify who will host the data from the Smart Home Pilot Project and what steps have been taken to ensure the security of the data.

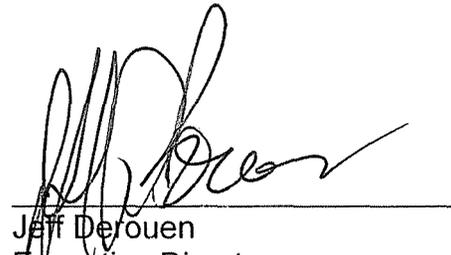
b. Explain how the Smart Home Pilot Project fits into Owen's long-term strategy for demand-side management and demand response programs.

² Id.

c. Explain why the total budget cost of the Smart Home Pilot Project has increased from \$490,000 to \$793,325. Include with the explanation a breakdown of the most recent projected budget.

d. Explain how Owen will pay for the \$361,663 for its share of the Smart Home TOD program.

e. Tendril Networks, Inc. has been selected as the vendor to provide services for the Smart Home program at a cost of \$793,325. Explain whether this is the total cost of the program. If there are other costs, provide the individual cost and an explanation of the reason for the cost.



Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
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DATED **MAY 15 2012**

cc: Parties of Record

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